

UPDATED 12/12/12

JEFFERSON COUNTY HUMAN SERVICES DEPARTMENT

CODE OF CONDUCT FOR EMPLOYEES

MISSION AND VISION STATEMENTS

Mission Statement

Enhance the quality of life for individuals and families living in Jefferson County by addressing their needs in a respectful manner, and enable citizens receiving services to function as independently as possible, while acknowledging their cultural differences.

Vision Statement

All citizens have the opportunity to access effective and comprehensive human services in an integrated and efficient manner.

PURPOSE OF CODE OF CONDUCT

This Code of Conduct is integral to JCHSD commitment to provide high quality care with honesty and integrity. The Code of Conduct articulates the basic values, ethical principles and standards of JCHSD. When individuals become part of JCHSD, their conduct is expected to reflect the Department's and County's values. All employees (full time, part-time and LTE's), interns, volunteers, contractors, network providers and other designated individuals acting on JCHSD behalf are required to comply with the letter and spirit of the Code of Conduct.

The Code of Conduct is intended to complement, not replace, County and Department policies and procedures or other professional codes that are required for licensure or certification.

The absence of an explicit reference to a specific behavior or situation does not mean the behavior is ethical or unethical. The standards are not meant to be exhaustive. Rather, the Code of Conduct provides guidance for decision-making and conduct when ethical issues arise. If there is not an existing Department or County policy on a particular subject matter, the general principles of this Code of Conduct are to be used as a guideline.

Questions regarding the Code of Conduct should be directed to Barb Mottl, the Compliance Officer, at 920-674-3105.

CODE OF CONDUCT

QUALITY OF CARE & SERVICE

The term “we,” as used in this document, refers to JCHSD employees, volunteers, contractors, network providers, board members, interns and other individuals authorized to act as representatives of JCHSD, both inside and outside the Department’s facilities.

We are committed to providing high quality, caring, ethical and professionally competent services to our consumers and their families, our constituents and the community.

We:

- Apply sound professional principles in our daily work and activities with an emphasis on evidence-based treatment and/or standard of care.

- Participate in activities that promote quality improvement and bring deficiencies to the attention of those who can assess and resolve the problems.
- Treat consumers and constituents in a manner respectful of their age, gender, personal preferences, culture, religion, and heritage.
- Do not deny care on the basis of race, gender, religion, creed, color, economic status, sexual orientation, disability, marital status, age, or any other discriminatory characteristic.
- Conform to the Code of Ethics and standards of our respective professions.
- Ensure that the source or amount of payment for consumer services shall not affect the quality of care or service.
- Provide consumers with the information needed, in a fashion and format understandable to them, to make fully informed decisions including the right to receive and understand information about JCHSD services, policies, procedures, fees, network provider list, grievance procedure, consent for services, and confidentiality requirements. Consumers are made aware of their treatment options, goals, and possible length of care or treatment.
- Strive to enhance consumers' capacity and opportunity to change and address their own needs by including them in developing treatment goals and plans to every extent possible.
- Provide competent services within the boundaries of our education, training, license, certification, consultation received, experience or other relevant professional experience.
- Document all consumer service encounters in the JCHSD' records accurately, completely and timely following established documentation guidelines.

WORKPLACE CONDUCT

We ensure our work environment supports high standards of professional behavior and promotes dignity, integrity, fairness, respect, teamwork and safety.

We:

- Strive for positive and cooperative relationships with JCHSD colleagues by treating each other with respect, dignity, fairness and courtesy. Maintain a working environment free from all forms of harassment or intimidation – verbal, sexual, or otherwise. Discriminatory treatment, abuse, violence or intimidation is not tolerated.
- Promote a positive and professional image for JCHSD, its employees and services.
- Take personal responsibility for performing duties in good faith and exercise sound judgment.
- Use work hours to accomplish County duties and assignments in a productive and professional manner.
- Ensure consumer/client information, in all medium, is maintained in a confidential manner that meets or exceeds all applicable laws and regulations.
- Require staff who oversee or supervise the work of others to:
 - a. provide clear direction about what is expected of them regarding both job responsibilities and workplace conduct.
 - b. ensure no employee is required to compromise their professional integrity, standards, judgment or objectivity in the performance of their duties.

STAFF-CONSUMER RELATIONSHIPS

We are committed to providing services by qualified staff that are compassionate, courteous, culturally competent, fiscally responsible and ethical.

We:

- Conduct ourselves in a manner that shows concern and respect for the dignity of consumers treating them in a manner appropriate to their background, culture, religion and heritage. The welfare of consumers and their families is placed above all other concerns unless one's own safety is threatened.
- Do not take unfair advantage of the professional relationship with current or former consumers or exploit them to further our personal, religious, political, social or business interests. Dual or multiple relationships, where there is a risk of exploitation or potential harm to the consumer, are prohibited for two years after a consumer is discharged from services or the date of the last professional contact.
- Understand that in the course of events, there is the possibility a dual relationship may be discovered and/or is unavoidable with consumers and providers. In such instances, the details of the relationship and any potential conflicts will be immediately disclosed to the supervisor for guidance regarding the conflict. We are responsible to set clear, thoughtful, appropriate, and culturally sensitive boundaries.
- Staff shall respect consumers' right to privacy and protect consumers' confidentiality by adhering to all rules, regulations, and professional practices and standards of privacy and confidentiality. Avoid discussing confidential information in public or semipublic areas such as in social

media, hallways, front/reception desk, waiting rooms, rest rooms, elevators and restaurants. Confidential information is never used for personal benefit or the benefit of any other person.

- Practitioners shall ensure customer/client information, in all medium, be maintained in such a confidential manner that meets or exceeds all applicable laws and regulations.
- Provide consumers with reasonable access to their medical records following policy based on regulations. Where there is concern regarding a consumer's access to his/her record that could cause misunderstanding or harm, clinical staff must assist the consumer in interpreting the records.
- Do not involve consumers, families or other service providers in criticism or controversy related to internal policies, practices, staff actions or personalities. In no case is this information ever part of a client's record.

ADHERING TO LAWS AND REGULATIONS

We follow the letter and the spirit of applicable laws and regulations and conduct business ethically and honestly.

We:

- Comply with all applicable laws, rules, regulations, standards and other requirements of the federal mental health care and alcohol and drug program statutes, regulations, and guidelines.
- Do not engage in any practice that involves unethical or illegal activity. If unsure of the meaning or application of a statute,

regulation, policy or legality, we seek guidance from our supervisor or the Compliance Officer.

- Strive to ensure no false, fraudulent, inaccurate or fictitious claims for payment or reimbursement of any kind are submitted. These claims include, but are not limited to time cards/e-dals, travel and expense reports, billings, cost reports, and all clinical documentation.
- Take reasonable precaution to ensure billing and coding of claims are prepared and submitted accurately, timely, and are consistent with federal, state and local laws and regulations as well as JCHSD policies and procedures and/or agreements with third party payors. This includes federal health care program regulations and procedures, or instructions otherwise communicated by regulatory agencies, such as the Centers for Medicare and Medicaid Services or their agents.
- Bill only for eligible services actually rendered, reported to the quarter hour and fully documented. When services must be coded, we use only billing codes that accurately describe the services provided.
- Act promptly to investigate and correct problems if errors in claims or billings are discovered.
- Voluntarily disclose to third party law enforcement or regulatory agencies violations of law, regulations or standards during investigations, audits and other situations where appropriate and legally required.

- Do not intimidate, threaten, coerce, discriminate against, nor take other retaliatory action against any consumer, constituent, contractor or employee who exercises the right to file a complaint or who participates in an investigation or proceeding relative to a complaint.

CONFLICTS OF INTEREST

We avoid conflicts of interest or the appearance of conflicts between our own personal interests and the best interests of the Department and the County.

We:

- Avoid commitments that interfere with our ability to properly perform our duties for JCHSD or any activity that conflicts with the known interest of JCHSD, its consumers or constituents. Examples include, but are not limited to:
 - a. the use of County time, facilities or equipment for private gain or advantage for oneself or another;
 - b. the solicitation of future employment with a company doing business with JCHSD over which the employee has some control or influence in his/her official capacity.
- Report any potential conflicts of interest for ourselves or others to the appropriate supervisor, manager or Compliance Officer.
- Prohibit individual staff in private practice from referring consumers to themselves or actively engaging in any relationship with other staff to promote referrals to their private practices.

- Do not accept or provide any gift of more than nominal value or any hospitality or entertainment, which, because of its source or value, might influence independent judgment in transactions involving JCHSD.
- Voluntarily disclose to our immediate supervisor or the Compliance Officer any financial interest, official position, ownership interest or any other relationship an employee or member of his/her immediate family has with JCHSD vendors, contractors or referral sources.

EXTERNAL RELATIONSHIPS

We continually strive to honor, uphold and promote the public trust in all our activities.

We:

- Carry out our duties in a way that encourages participation and access to JCHSD programs and resources and that enhances the Department's standing in the community.
- Are honest and forthright in providing information to consumers, vendors, payors, other agencies and the community within the constraints of privacy and confidentiality requirements and as allowed by law.
- Seek helpful and cooperative relationships with external agencies and community groups to enhance services and resources available to the public.

- Ensure all legally required reports and documents, or other information provided to any external entity including federal, state and local government agencies are accurate and submitted timely. Only authorized staff sign required reports and documents.

RECORDS MAINTENANCE

We are conscientious in maintaining accurate and appropriate records in accordance with all federal, state and local laws and regulations and JCHSD policies and procedures.

We:

- Maintain complete, accurate, current and thorough records stored in secure locations and made available only to those authorized to have access.
- Abide by professional, legal and ethical codes governing confidentiality to ensure all records in any medium and at all service locations are maintained in a manner to protect employee and consumer privacy rights and to provide factual information.
- Maintain, train and monitor adherence to documentation and record keeping guidelines following legal requirements. Records are maintained for at least the minimum period required by laws and regulations.

Code of Conduct

I, _____, have read and understand the Jefferson County Human Services Department Code of Conduct.

I discussed this with my supervisor and any questions I had have been answered.

Employee

Date

Supervisor

Date